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**October 1, 2020**

**VIA ECF**

Honorable Kimba M. Wood  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: United States v. Sal Castro, 19 Cr. 116 (KMW)

Your Honor:

I am writing this letter requesting that the date last set by the Court for sentencing be converted to a status conference. The reason for this request is that I have been informed by Mr. Castro that he has filed a pro se motion to withdraw his guilty plea. Although I have not received an actual copy of the motion as filed, I have viewed most of what was submitted via e mail communication with my client. The arguments Mr. Castro puts forward, inartfully, are not frivolous. In fact, they are problematic for a number of reasons. I have not, as of this writing, discussed this with the government, although I have reached out and I am awaiting a call back.

I will keep the Court informed of the government's position as soon as I am told what their position on this application is.

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Respectfully submitted,

*Benjamin Heinrich*  
Benjamin Heinrich, Esq,  
Counsel for defendant-Sal Castro

cc.: AUSA Michael Kraus (ECF)